

EXHIBIT 111

**UPDATED DECLARATION UNDER PENALTY OF PERJURY
PURSUANT TO 28 U.S.C. § 1746**

1. My name is Pamela Terekhova. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am currently a resident of Oklahoma and my residence address is [REDACTED] [REDACTED] Edmond, OK 73028. Prior to moving to Oklahoma in 2019, I lived in Georgia in Chatham County and my residence address was [REDACTED] Pooler, GA 31322.
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3. My polling location in Georgia was the Rothwell Baptist Church.
4. For the 2018 Georgia General Election, I went to the polls three times, stood in long lines twice, and still was not able to cast my ballot and exercise my right to vote.
 - a. I lived in Pooler for ten years before my recent move to Oklahoma. The Rothwell Baptist Church had always been my voting place. During the 2016, Presidential Election there was a two-hour wait. There was always a line but, in 2018, it was unbelievable.
 - b. I dropped my son off at school and arrived at the Church 7am. The street was extremely dark and dangerous at that hour. I drove past a long line of people waiting in the street to find a place to park. Most of the parking lot and the field were being used for the line.

- c. After I parked, I joined the line in the street. There was no sidewalk; we were standing in the gutter. There was only enough room for one car to go by at a time; the other car would have to wait while oncoming traffic passed. There were cars trying to get by us and I thought I was going to get hit. I waited in line for about thirty minutes and the line wasn't moving at all. So I left.
- d. I came back at about 1:30pm and this time I found a place to park on the field. It was hot. The line wrapped around inside of the parking lot and the field; it did not spill out onto the street. When I got there, I saw my neighbor was there with two small children about halfway to the church, and she said that she had been in line for two hours. I thought, "Oh my god, you have a baby! This is ridiculous." There were old people there, people with babies, people sitting down on the pavement.
- e. The Chatham County Sheriff was there, so I asked him what he could do to help. I told him the situation was ridiculous and asked whether the old people and babies go inside. The Sheriff said, "this is my first time working at the elections; I don't know." I was appalled. He is the Sheriff of Chatham County! Finally, the elderly couple in front of

me—he was 76 and his ankles were swelling—were allowed to cut the line and go inside. I counted 200 people in line at this time.

- f. I waited for two hours in the parking lot and only moved half the distance I needed to. I saw some people coming out who said they had been there since 10:30am and it was now 2:30 in the afternoon. After hearing this, I gave up hope.
- g. The word was that they only had 7 or 8 polling machines and because we had so many questions on the ballot, and it took 10 minutes/person to vote. My son was coming home from school, so I had to leave.
- h. Around 6:30pm, my son and I went back. I drove for the third time to the Church and again saw people in the street and wrapped around the parking lot.
- i. I couldn't find a parking spot and it was getting dark. It was dangerous for my son and me to stand in line on the street in the dark while cars go by. So we kept driving.
- j. I went to the polls three times and stood in line twice and was not able to vote.
- k. I was glad that we didn't wait because, the next day, a woman at my church told me she was there from 6:30pm - 11:00pm. She had stood in line earlier in the day while she waited to vote and then her husband

5. I initially signed a Declaration on January 17, 2019 and am re-signing this declaration today in order to correct the name of the polling location and to incorporate the fact that I have now moved out-of-state.
6. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
7. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
8. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 11 day of October, 2019.


Pamela Terekhova